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7 *Attorneys for Defendant*  
NETFLIX, INC.

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA**

10 **OAKLAND DIVISION**

11 LAURI VALJAKKA,

Case No.: 4:22-cv-01490-JST

12 *Plaintiff,*

13 v.

14 NETFLIX, INC.,

15 *Defendant.*

**DECLARATION OF RACHAEL D.  
LAMKIN IN SUPPORT OF DEFENDANT  
NETFLIX, INC.’S RESPONSE TO LAURI  
VALJAKKA’S MOTION FOR  
SUMMARY JUDGMENT DISMISSING  
THE CUVTA COUNTERCLAIM**

16 Judge: Hon. Jon S. Tigar

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4:22-CV-01490-JST

1 I, Rachael D. Lamkin, hereby declare:

2 1. I am a partner with the law firm Baker Botts L.L.P. (“Baker Botts”), and counsel of  
3 record for Defendant Netflix, Inc. (“Netflix”) in the above-captioned matter.

4 2. I am admitted to practice in all state and federal courts in California, federal courts  
5 in Colorado and the Eastern and Western Districts of Texas. I am also admitted in the Federal  
6 Circuit, the International Trade Commission, the Court of International Trade, and this Honorable  
7 Court.

8 3. I have personal knowledge of the facts stated herein.

9 4. Attached as Exhibit 1 is a true and correct copy of a redline comparison prepared by  
10 counsel for Netflix, using Microsoft Word, between Valjakka’s opposition to Netflix’s motion for  
11 a preliminary injunction under the CUVTA and his opening brief moving for summary judgment  
12 on Netflix’s CUVTA claim. The substance of the briefs has been reproduced word-for-word and  
13 compared for the Court’s ease of reference; no statements therein have been altered or modified.

14 5. Attached as Exhibit 2 is a true and correct copy of an email from Eric Morehouse to  
15 Lauri Valjakka and Onni Hietalahlti, dated November 30, 2021.

16 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true  
17 and correct to the best of my knowledge.

18 Executed on 8<sup>th</sup> day of September 2025 in San Francisco, California.

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20 */s/ Rachael D. Lamkin*  
Rachael D. Lamkin

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